

1 DAWYN R. HARRISON, County Counsel  
2 STARR COLEMAN, Assistant County Counsel  
3 THOMAS R. PARKER, Senior Deputy County Counsel  
4 (SBN 141835) • [TParker@counsel.lacounty.gov](mailto:TParker@counsel.lacounty.gov)  
5 648 Kenneth Hahn Hall of Administration  
500 West Temple Street  
6 Los Angeles, California 90012-2713  
7 Telephone: (213) 974-1834  
8 Facsimile: (213) 613-4751

9 Thomas C. Hurrell, State Bar No. 119876  
10 E-Mail: [thurrell@hurrellcantrall.com](mailto:thurrell@hurrellcantrall.com)  
11 Jonathan Fang, State Bar No. 279106  
12 E-Mail: [jfang@hurrellcantrall.com](mailto:jfang@hurrellcantrall.com)  
13 HURRELL CANTRALL LLP  
14 725 S. Figueroa Street, Suite 3800  
15 Los Angeles, California 90017  
16 Telephone: (213) 426-2000  
17 Facsimile: (213) 426-2020

18 Attorneys for Defendants, CLARK R. TAYLOR, AICP, THE LOS ANGELES  
19 COUNTY DEPARTMENT OF REGIONAL PLANNING

20 **UNITED STATES DISTRICT COURT**

21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

22 CLINTON BROWN,

23 Plaintiff,

24 v.

25 CLARK R. TAYLOR, AICP, THE  
26 LOS ANGELES COUNTY  
27 DEPARTMENT OF REGIONAL  
28 PLANNING,

Defendants.

Case No. 2:22-cv-09203-MEMF-KS

**REQUEST FOR BRIEFING  
SCHEDULE RE: PLAINTIFF  
CLINTON BROWN'S REQUEST  
FOR JUDICIAL NOTICE NO. 2**

Assigned to:  
Hon. Maame Ewusi-Mensah Frimpong  
Courtroom "8B"

Magistrate Judge Karen L. Stevenson  
Courtroom "580"

29 ////

30 ////

31 ////

32 ////

33 ////

1 | TO PLAINTIFF, ALL PARTIES, THE HONORABLE COURT:

2 Defendant Clark Taylor, in his official capacity for the Los Angeles County  
3 Department of Regional Planning ("Defendant" or "County") hereby requests that  
4 the Court set a briefing schedule for Plaintiff Clinton Brown's Request for Judicial  
5 Notice No. 2 (Dkt No. 89) ("RJN#2"). Plaintiff's RJN#2 fails to comply with L.R.  
6 7-4 as it does not state the date or time of the motion hearing and the name of the  
7 judicial officer before whom the motion has been noticed. L.R. 7-4 states:

8 "The Court may decline to consider a motion unless it meets the requirements  
9 of L.R. 7-3 through 7-8. On the first page of the notice of motion and every  
10 other document filed in connection with any motion, there shall be included,  
11 under the title of the document, the date and time of the motion hearing, and  
the name of the judicial officer before whom the motion has been noticed.  
The notice of motion shall contain a concise statement of the relief or Court  
action the movant seeks."

2 In alternative, if the Court is so inclined, Defendant requests that the Court  
3 strike in its entirety Plaintiff's Request for Judicial Notice No. 2 (Dkt No. 89) and  
4 require Plaintiff re-file his Request for Judicial Notice No. 2 in compliance with all  
5 applicable Federal Rules, Local Rules, and Judge's Procedures.

7 | DATED: November 16, 2023 Respectfully submitted,

HURRELL CANTRELL LLP

By: */s/ Jonathan Fang*

THOMAS C. HURRELL  
JONATHAN FANG  
Attorneys for Defendants, CLARK R.  
TAYLOR, AICP, THE LOS ANGELES  
COUNTY DEPARTMENT OF  
REGIONAL PLANNING